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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CAMILLE LAVINGTON,

Plaintiff,

vs.

**TRUMP PLAZA ASSOCIATES d/b/a
TRUMP PLAZA HOTEL AND CASINO,**

Defendant.

CAMDEN VICINAGE

CIVIL CASE NO:

04cv2136
(FLW)

**COMPLAINT AND
JURY DEMAND**

INTRODUCTION

1. The Plaintiff CAMILLE LAVINGTON, residing at 160 East 92nd Street, New York, New York, 10128, brings this complaint against the Defendant TRUMP PLAZA ASSOCIATES d/b/a TRUMP PLAZA HOTEL AND CASINO, having their principal place of business in Atlantic City, New Jersey, for damages arising out of common law claims relative to serious injuries sustained by the Plaintiff while on the Defendant's premises.

JURISDICTION

2. Plaintiff CAMILLE LAVINGTON is a citizen of the State of New York. Defendant TRUMP PLAZA ASSOCIATES d/b/a TRUMP PLAZA HOTEL AND CASINO is a corporation incorporated under the laws of the State of New Jersey having their principle places of business in the State of New Jersey. Jurisdiction therefore lies in the United States Federal District Court for the District of New Jersey pursuant

to 28 U.S.C.A. § 1332, diversity of citizenship. This matter in controversy exceeds, exclusive of interest and costs, the sum specified by 28 U.S.C. § 1332.

PARTIES

3. Plaintiff CAMILLE LAVINGTON is a citizen of the United States of America and is a resident of New York City, County of New York and State of New York.

4. On September 17, 2003, CAMILLE LAVINGTON was a business invitee on the defendant's premises, the TRUMP PLAZA HOTEL AND CASINO which is located in Atlantic City, Atlantic County, State of New Jersey.

5. At the aforesaid time and place, the Plaintiff was caused to fall.

6. Defendant through its employees, agents and representatives were negligent as follows:

(a) In maintaining a dangerous condition, which was negligently designed and built.

(b) Failing to inspect the area where the Plaintiff fell prior to the occurrence of the accident.

(c) In failing to have proper signals or warnings relative to the dangerous condition, which caused the Plaintiff to fall.

(d) In failing to maintain the area in question in a safe condition.

7. The aforesaid acts of negligence were proximate causes of the Plaintiff's fall.

8. As a result of the aforesaid, the Plaintiff, CAMILLE LAVINGTON suffered injuries requiring medical treatment, was caused pain and suffering, was prevented from pursuing usual activities; and has permanent disabilities that will affect Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendant for damages, interest and cost of suit.

JURY DEMAND

Plaintiffs demand a jury trial.

D'AMATO & D'AMATO, P.C.

BY: 
PAUL R. D'AMATO, ESQUIRE

DATED: May 3, 2004

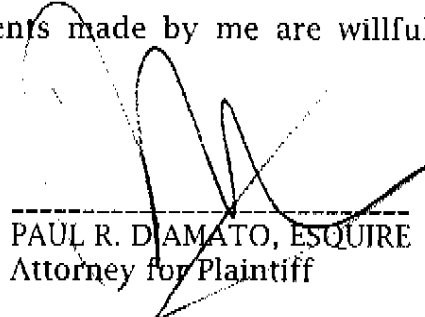
CERTIFICATION

Paul R. D'Amato, Esquire, of full age, certifies:

1. I am a member of the firm of D'AMATO & D'AMATO, P.C., and am entrusted with the preparation and trial of this case.

2. This case is not subject to any other court action or arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.


PAUL R. D'AMATO, ESQUIRE
Attorney for Plaintiff

DATED: May 3, 2004